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WD OF TN MEMPHIS

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

Steve Tuggle  
3988 Autumn Spring Cv  
Memphis Tn 38125  
(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. \_\_\_\_\_

Kelly Services  
1769 Paragon Place #112  
Memphis, Tn 38132  
(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, Steve Tuggle  
(name of plaintiff)

is a citizen of the United States and resides at 3988 Autumn Spring Cv  
(street address)

Memphis U.N Tn  
(city) (country) (state)  
38125 (901) 337-7162  
(zip code) (telephone number)

3. Defendant Kelley Services  
(defendant's name)

lives at, or its business is located at \_\_\_\_\_  
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at  
Kelley Services - 1769 Paragon Place, #112  
(street address)  
Memphis, America, TN 38132  
(city) (country) (state) (zip code)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about \_\_\_\_\_

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on \_\_\_\_\_. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) \_\_\_\_ race, (2) \_\_\_\_ color, (3) \_\_\_\_ sex, (4) \_\_\_\_ religion, (5) \_\_\_\_ national origin, defendant

- (a) \_\_\_\_ failed to employ plaintiff.
- (b) \_\_\_\_ terminated plaintiff's employment.
- (c) \_\_\_\_ failed to promote plaintiff.
- (d) \_\_\_\_

10. The circumstances under which defendant discriminated against plaintiff were as follows: I, Steve Tuggle are suing Kelly Service's for discrimination. After 4 years off laying me off ~~for what~~ I felt discriminated against when John who was a caucasian male fired me for asking for a back brace before starting to load a truck. I Also felt I was discriminated against when after 3 years of being laid off Kelly Service refused to hire me for Johnson and Johnson while complain to the EEOC I finally have my Lawsuit. Kelly Service told me I could never be hired again there Kelly's because I was in the computers for in subordination which is a lie. QC, Dock stocker are the positions

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_\_ are still being committed by defendant.
- (b) \_\_\_\_ are no longer being committed by defendant.
- (c) \_\_\_\_ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_\_ Defendant be directed to employ plaintiff, or
- (b) \_\_\_\_ Defendant be directed to re-employ plaintiff, or
- (c) \_\_\_\_ Defendant be directed to promote plaintiff, or;
- (d) \_\_\_\_ Defendant be directed to \_\_\_\_\_

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ) No ( )

Steve Tuggle  
SIGNATURE OF PLAINTIFF

3988 autumn spring cv  
memphis, TN 38125